

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

AYA HEALTHCARE, INC.,

Plaintiff,

v.

RALPH DE LA TORRE and MEDICAL
PROPERTIES TRUST, INC.,

Defendants.

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CIVIL ACTION NO. 3:24-cv-000390-B

**UNOPPOSED MOTION OF DEFENDANT MEDICAL PROPERTIES TRUST, INC.
TO EXTEND DEADLINE TO RESPOND TO COMPLAINT**

Defendant Medical Properties Trust, Inc. (“MPT”) files this unopposed motion (the “Unopposed Motion”) to extend the deadline for MPT to respond to the *First Amended Complaint* [Docket No. 4] (the “Complaint”), and respectfully shows the Court as follows:

1. MPT was served with the Complaint on February 27, 2024. *See* Docket No. 16.
2. MPT’s current deadline to respond to the Complaint is March 19, 2024.
3. MPT seeks additional time to respond to the Complaint. The requested extension is sought in good faith and not for purposes of undue delay or prejudice. The requested extension is intended to provide MPT’s recently-retained counsel an opportunity to explore potential defenses and to confer with counsel for Aya Healthcare, Inc. (“Plaintiff”) in an effort to identify and potentially narrow the scope of issues in dispute.¹

¹ As of the date hereof, Plaintiff has not filed a proof of service of the Summons and Complaint with respect to Defendant Ralph de la Torre. MPT understands that Mr. de la Torre is in discussions with Plaintiff concerning his deadline to respond to the Complaint. In the event that Mr. de la Torre’s response deadline is later than April 15, 2024, MPT reserves the right to seek a further extension of its own response deadline in order to harmonize the timeline for both Defendants.

4. MPT's counsel has conferred with Plaintiff's counsel. Plaintiff does not oppose extending MPT's deadline to answer or otherwise respond to the Complaint until April 15, 2024.

REQUEST FOR RELIEF

WHEREFORE, Defendant MPT respectfully requests that the Court grant this Unopposed Motion and extend the time for MPT to file a response to the Complaint until April 15, 2024.

Dated: March 12, 2024

Respectfully submitted,

GRAY REED & MCGRAW LLP

/s/ London England
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**Pro hac vice application forthcoming*

**ATTORNEYS FOR DEFENDANT MEDICAL
PROPERTIES TRUST, INC.**

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on March 6, 2024, counsel for Defendant Medical Properties Trust, Inc., Samuel M. Kidder (*pro hac vice* motion forthcoming), conferred with Plaintiff's counsel, Andrew Gallo, who confirmed Plaintiff is in agreement with the requested relief.

/s/ London England
London England

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 12, 2024, the above and foregoing instrument was electronically filed with the Clerk of the court using the CM/ECF system on, which will send notification to the attorneys of record for all parties to this suit. Counsel for Ralph de la Torre will be served via email.

/s/ London England
London England